

# **EXHIBIT 30**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DIGNA RUIZ, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

CITIBANK, N.A.,

Defendant.

Civ. No.: 10-cv-5950 (JGK) (THK)

Judge John G. Koeltl

Magistrate Judge Theodore H. Katz

FREDERICK WINFIELD, et al.,

Plaintiff,

v.

CITIBANK, N.A.,

Defendant.

Civ. No: 10-cv-7304 (JGK) (THK)

DECLARATION OF LASHONDA WILSON

I, LASHONDA WILSON, upon personal knowledge and under penalty of perjury, declare as follows:

1. I am a resident of the State of Pennsylvania.
2. I was a full-time employee of Citibank, N.A. ("Citibank") in the position of Personal Banker from September 2007 to June 2010 at the Citibank branch office located in the Chestnut Hill neighborhood of Philadelphia, Pennsylvania.
3. As a Personal Banker, I sold Citibank's financial products and services to prospective and current consumer clients. These financial products included checking and savings accounts, loans, lines of credit, and insurance. I serviced clients by generally servicing

their accounts, answering their questions, and providing assistance in operating the ATM machine.

4. My duties also included generating new business by making sales calls to prospective and current customers, participating in marketing events and campaigns, and helping other employees at the branch to identify referral opportunities. I was required to make some of those sales calls during monthly mandatory "call nights," which took place on a weeknight after the branch closed.

5. There were many steps to complete the sale of a financial product. For example, to open a checking or savings account, I had to interview the client, collect and review required documents, submit the completed paperwork, and deposit the cash or check to the account.

6. Citibank set monthly "sales goals" for all Personal Bankers, which were the minimum number of sales credits we had to earn in a month. If we did not meet our sales goals in a given month, we would be put on probation and then terminated if the goals were not met during the probationary period.

7. At one point, I learned from my supervisor, the branch manager, that working and recording overtime was not permitted.

8. However, I frequently worked more than forty hours per week because I could not meet my sales goals and the other demands of my job within a forty-hour workweek. I had to work through my lunches and stay beyond my scheduled shift to keep my job.

9. I know my branch managers knew about the overtime I worked during lunch and after my shift because they saw me working at those times.

10. After I learned about the overtime policy, I generally did not record overtime on my timesheets, and thus was not paid for my overtime hours.

11. If I did submit overtime hours, the branch manager would sometimes alter the timesheet to show fewer hours than I originally submitted. The timekeeping system at Citibank permitted changes to be made to timesheets after I entered my time.

12. I saw other Personal Bankers at my branch also perform the same duties that I performed as described above. Their names are Jermaine Washington and Leigh Anne Roberts.

13. Like me, these Personal Bankers also worked overtime hours and were not properly compensated. I know this happened because I saw them working overtime, and they told me they were not paid for such work.

14. I had a computer at my desk on which I did my work. I accessed my computer by logging in with my fingerprint.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

21 day of April, 2011

  
LASHONDA WILSON